

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE – NASHVILLE DIVISION**

IN RE: Integrated Healing Technologies, LLC DEBTOR.	CASE NO. 18-04526-RM3-7 CHAPTER 7 JUDGE Randal S. Mashburn
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**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: 8/2/18
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: 8/14/18, 9:00 A.M.,
COURTROOM ONE, U.S. CUSTOMS HOUSE, 701 BROADWAY, NASHVILLE, TENNESSEE**

NOTICE OF MOTION TO EMPLOY AS COUNSEL THE LAW FIRM IN WHICH HE IS A MEMBER

John C. McLemore, Trustee, has asked the Court for the following:

Permission of the Court to employ the Law Office of John C. McLemore, PLLC, to represent him in the above-styled matter.

YOUR RIGHTS MAY BE AFFECTED. If you do not want the Court to grant the attached motion, or if you want the Court to consider your views on the motion, then on or before 8/2/18, you or your attorney must:

1. File with the Court your response or objection explaining your position. **PLEASE NOTE: THE BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE REQUIRES ELECTRONIC FILING. ANY RESPONSE OR OBJECTION YOU WISH TO FILE MUST BE SUBMITTED ELECTRONICALLY. TO FILE ELECTRONICALLY, YOU OR YOUR ATTORNEY MUST GO TO THE COURT WEBSITE AND FOLLOW THE INSTRUCTIONS AT: <https://ecf.tnmb.uscourts.gov>.**

If you need assistance with Electronic Filing, you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: U.S. Bankruptcy Court, 701 Broadway, 1st Floor, Nashville, Tennessee (Monday – Friday, 8:00 a.m. – 4:00 p.m.).

2. **Your response must state that the deadline for filing responses is 8/2/18, the date of the scheduled hearing is 8/14/18 and the motion to which you are responding is *Motion to Employ as Counsel the Law Firm in Which he is a Member*.**
3. You must serve your response or objection by electronic service through the Electronic Filing system described above. You must also mail a copy of your response or objection to:

John C. McLemore, Trustee
2000 Richard Jones Rd., Ste. 250
Nashville, TN 37215-8249

United States Trustee
701 Broadway, Customs House Suite 318
Nashville, TN 37203

If a timely response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. ***THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.*** You may check whether a timely response has been filed by calling the Clerk's office at (615) 736-5584 or viewing the case on the Court's website at www.tnmb.uscourts.gov.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

This 12th day of July, 2018.

Respectfully submitted,

/s/ John C. McLemore, Trustee
John C. McLemore, Trustee
Tn. Bar No. 3430
2000 Richard Jones Rd., Ste. 250
Nashville, TN 37125
(615) 383-9495 (phone)
(615) 292-9848 (fax)
jmclmore@gmylaw.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE - NASHVILLE DIVISION**

IN RE:	
Integrated Healing Technologies, LLC	CASE NO. 18-04526-RM3-7
	CHAPTER 7
DEBTOR.	JUDGE Randal S. Mashburn

MOTION TO EMPLOY AS COUNSEL THE LAW FIRM IN WHICH HE IS A MEMBER

Comes the Trustee, John C. McLemore, and respectfully requests permission of the Court to employ the Law Office of John C. McLemore, PLLC, to represent him in the above-styled matter. In support of this motion, the Trustee respectfully represents:

1. He has been appointed Trustee of the above-styled estate, is duly qualified and acting.
2. Matters have arisen in the administration of this bankruptcy the pursuit of which will require the services of an attorney licensed to practice in the state and/or federal courts of Tennessee. The Trustee is an attorney licensed to practice before all courts within the state. As a matter of efficiency, the Trustee seeks his appointment as counsel for the estate. The responsibilities of counsel may include but not be limited to one or more of the following matters:
 - 2.1 Drafting and filing pleadings necessary in the administration of the estate. In addition to routine case administration this Trusteeship will involve patent laws, retail sales, and potential bulk sales of inventory all of which is FDA regulated. In certain instances, it may be necessary to employ special counsel. It is likely the Trustee will have to do legal research in those areas and the Trustee may find himself in a situation that will require him to represent the estate in Court.
3. The Trustee desires to retain and employ the Law Office of John C. McLemore, PLLC, as his attorney under a general retainer to perform such of the above described services as are necessary and are desirable in the administration of this estate.
4. The Trustee has selected this firm as counsel because of the extensive experience in the field of bankruptcy, insolvency and debtors' and creditors' rights, and other matters. Accordingly, the Trustee believes this attorney is well qualified to represent the estate in this case.
5. It is necessary and essential that the Trustee employ the attorney under a general retainer based on time and standard billable charges, because of the legal services required for this estate.
6. The Law Office of John C. McLemore, PLLC, has indicated its willingness to act on the Trustee's behalf. The firm consists of one member. The following are the billing rates for each member of the firm:

John C. McLemore	\$375 per hour
Investigator	\$150 per hour
Paralegal	\$100 per hour

7. The Trustee is a member in the Law Office of John C. McLemore, PLLC. The Trustee may serve as his own attorney while conducting the administration of this estate.

I VERIFY UNDER PENALTY OF PERJURY, except as set forth on Appendix A hereto and in paragraph 7 hereof, the member of the firm of John C. McLemore, PLLC, has no connection with the Debtor, its creditors or any other party in interest, or their respective attorneys or accountants, the United States Trustee, or any person employed in the office of the United States Trustee, and represent no interest adverse to the estate in the matters upon which it is to be retained. The Trustee and the member of the Law Office of John C. McLemore, PLLC, are "disinterested persons" as this term is defined in 11 U.S.C. 101(13) and are qualified to act as counsel in these matters.

8. Simultaneous with this filing, the Trustee will seek the employment of Thompson Burton, PLLC to assist with this case.

The Trustee can foresee the possibility he will have to engage patent counsel as well as counsel with expertise in FDA issues. If the employment of additional counsel is requested, a clear delineation of duties between the law firms will be provided at that time.

WHEREFORE, applicant requests the entry of an order authorizing him to employ and retain the Law Office of John C. McLemore, PLLC, pursuant to and under a general retainer on the terms and conditions specified herein.

Dated this 12th day of July, 2018.

Respectfully submitted,

/s/ John C. McLemore, Trustee
John C. McLemore, Trustee
Tn. Bar No. 3430
2000 Richard Jones Rd., Ste. 250
Nashville, TN 37215
(615) 383-9495 (phone)
(615) 292-9848 (fax)
jmclmore@gmylaw.com

APPENDIX A

JOHN C. McLEMORE, A MEMBER OF THE LAW OFFICE OF JOHN C. McLEMORE, PLLC, IS A MEMBER OF THE TRUSTEE PANEL FOR THE MIDDLE DISTRICT OF TENNESSEE AND WAS APPOINTED TO THAT POSITION BY THE U.S. TRUSTEE FOR REGION VIII.

I FURTHER VERIFY UNDER PENALTY OF PERJURY THAT THE STATEMENTS CONTAINED IN THE FOREGOING MOTION ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF. I DO NOT HAVE ANY CONNECTION WITH THE DEBTOR, THE CREDITORS, OR ANY OTHER PARTY IN INTEREST, THEIR RESPECTIVE ATTORNEYS AND ACCOUNTANTS EXCEPT AS DISCLOSED BELOW:

NONE

/s/ John C. McLemore
John C. McLemore

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE - NASHVILLE DIVISION**

IN RE: Integrated Healing Technologies, LLC DEBTOR.	CASE NO. 18-04526-RM3-7 CHAPTER 7 JUDGE Randal S. Mashburn
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ORDER TO EMPLOY AS COUNSEL THE LAW FIRM IN WHICH HE IS A MEMBER

Upon consideration of the notice and motion of John C. McLemore, Trustee, for authority to employ the Law Office of John C. McLemore, PLLC, in connection with the above-styled matter, and it appearing that the sole member in the Law Office of John C. McLemore, PLLC, is duly admitted to practice in this Court, and represents no interest adverse to this estate, and no objections having been filed;

And it appearing to the Court that employment of counsel in this matter is necessary; it is hereby

ORDERED that John C. McLemore, Trustee, is authorized to employ the Law Office of John C. McLemore, PLLC, to represent the above-styled bankruptcy estate.

Counsel for the Trustee will make application to the Court for approval of all fees.

The effective date of this order will be the date of the filing of the Trustee's Motion to Appoint Counsel, July 12, 2018.

This Order was signed and entered electronically as indicated at the top of this page.

APPROVED FOR ENTRY:

/s/ John C. McLemore, Trustee
John C. McLemore, Trustee
Tn. Bar No. 3430
2000 Richard Jones Rd., Ste. 250
Nashville, TN 37215
(615) 383-9495 (phone)
(615) 292-9848 (fax)
jmclmore@gmylaw.com

Proposed

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE - NASHVILLE DIVISION**

IN RE:	
Integrated Healing Technologies, LLC	CASE NO. 18-04526-RM3-7
DEBTOR.	CHAPTER 7
	JUDGE Randal S. Mashburn

CERTIFICATE OF SERVICE

I hereby certify that on the date noted below, a true and correct copy was either served electronically or placed in the U.S. Mail, postage prepaid to the U.S. Trustee, 701 Broadway, Customs House Suite 318, Nashville, TN 37203; Debtor, Integrated Healing Technologies, LLC, c/o Albert Rodewald, Co-Chair of the Board, 4814 Byrd Lane, College Grove, TN 37046; Robert Lipman, Co-Chair of the Board, 411 Great Circle Rd., Nashville, TN 37228; Debtor's attorney, John C. Tishler, Waller Law, 511 Union Street., Ste. 2700, Nashville, TN 37219; all secured creditors, the 10 largest scheduled unsecured creditors, as shown on the mailing matrix which is attached to the original of this document and on file in the office of the Clerk of this Court; and to all parties requesting electronic notice via the court's electronic filing system.

This 12th day of July, 2018.

Respectfully submitted,

/s/ John C. McLemore, Trustee
John C. McLemore, Trustee
Tn. Bar No. 3430
2000 Richard Jones Rd., Ste. 250
Nashville, TN 37215
(615) 383-9495 (phone)
(615) 292-9848 (fax)
jmclemore@gmylaw.com

Attachments:

- (1) NOTICE OF MOTION TO EMPLOY AS COUNSEL THE LAW FIRM IN WHICH HE IS A MEMBER
- (2) MOTION TO EMPLOY AS COUNSEL THE LAW FIRM IN WHICH HE IS A MEMBER
- (3) APPENDIX A TO THE MOTION TO EMPLOY AS COUNSEL THE LAW FIRM IN WHICH HE IS A MEMBER
- (4) PROPOSED ORDER TO EMPLOY AS COUNSEL THE LAW FIRM IN WHICH HE IS A MEMBER

Integrated Healing Technologies, LLC
Case No. 18-04526-RM3-7

John C. Tishler
Waller Lansden Dortch & Davis
511 Union Street, Ste. 2700
Nashville, TN 37219

Gary Ferguson
9233 Old Smyrna Rd.
Brentwood, TN 37027

FirstBank
211 Commerce St., Ste. 300
Nashville, TN 37201

Five Star Venture Funding
2002 Tyne Blvd.
Nashville, TN 37215

Fred Goad
917 Stuart Lane
Brentwood, TN 37027

Graymar Investors
411 Great Circle Rd.
Nashville, TN 37228

Robert Lipman
411 Great Circle Rd.
Nashville, TN 37228

Keith Mullins
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Nashville, TN 37217

Linda Rebrovick
5202 Close Cir.
Nashville, TN 37205

Albert Rodewald
4814 Byrd Lane
College Grove, TN 37046

Timothy J. Patton Trust
2100 Londonberry
Ann Arbor, MI 48104